




RE: Soil removed from OU-1   
Sonya Pennock to: DC Orr  
Cc: Carol Campbell, Sean Earle

Libby  
OU1

  
1258942 - R8 SDMS

02/14/2011 11:26 AM

EPA has responded previously that we consider the issue of the buildings that were demolished during W.R. Grace's work at OU1 to be closed. If the City Council considers it otherwise, the Council should let EPA know.

Regarding the drainage issue, we have previously responded that we will address drainage issues during the remedial action at OU1.

Sonya Pennock  
Office of Communications & Public Involvement  
US/EPA Region 8  
1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone: 303-312-6600

DC Orr	Ms. Pennock; It has been months since I dis...	02/11/2011 06:47:42 AM
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From: DC Orr <xcav8orr@hotmail.com>  
To: Sonya Pennock/R8/USEPA/US@EPA, Sean Earle/R4/USEPA/US@EPA, Carol Campbell/R8/USEPA/US@EPA  
Date: 02/11/2011 06:47 AM  
Subject: RE: Soil removed from OU-1

Ms. Pennock;

It has been months since I disproved the EPA statements concerning restoration plans on OU-1. Will EPA acknowledge receipt of this email and explain the contradiction between their statements that a Restoration Plan was not required after the order of demolition and the requirement for a Restoration Plan found in this document?

Sincerely, DC Orr

From: xcav8orr@hotmail.com  
To: pennock.sonya@epamail.epa.gov  
Subject: FW: Soil removed from OU-1  
Date: Mon, 11 Oct 2010 06:50:11 -0600

Ms Pennock;

I don't see that you have ever responded to this information.  
DC

From: xcav8orr@hotmail.com  
To: pennock.sonya@epamail.epa.gov  
Subject: Soil removed from OU-1  
Date: Thu, 2 Sep 2010 14:02:22 -0600

Ms. Pennock;  
The City Council has had discussions with EPA and Corps reps concerning the drainage

problems that cropped up on OU-1 after Removal Action.

I have attached a page from the Action Memorandum Amendment dated July 20, 2001 which indicates that 14,149 cubic yards of material were removed and only 12,500 brought in as backfill. This is probably why the property no longer drains properly.

This page also refers to the damage done to those buildings during abatement with EPA oversight. This discounts the statement in the ROD, and Rebecca Thomas' 9-3-09 correspondence, that the buildings were in bad shape. They were damaged by abatement beyond repair. With EPA oversight.

Also, note the end of the last line in the first paragraph which reads, "EPA will direct Grace to demolish the buildings, while alternative restoration plans are being developed". EPA has stated that the requirement for restoration plans was dropped when the buildings were demolished. The statement is not supported by the public record which requires a restoration plan be developed AFTER demolition. Please supply this restoration plan to the Libby City Council. Make sure that you let me know when you send it so I can request it from our Mayor. He has a bad habit of "forgetting" to let Council know about his correspondence with EPA.

Sincerely, DC Orr